

Riker Gillespie
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Defendant Pro Per

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MISSOURI**

BY MAIL

AMERICAN	AUTOMOTIVE)	CASE NO. 4:20-cv-01114 RSW
SERVICE SOLUTIONS, INC., d/b/a)	
FENIX PROTECT, a Missouri)	ANSWER TO A CIVIL ACTION
corporation,)	
)	
Plaintiff,)	
vs.)	
)	
AGRUSS LAW FIRM, LLC, an)	
Illinois limited liability company;)	
ICEHOOK SYSTEMS, LLC, a New)	
York company; DISCORD, INC, a)	
Delaware corporation; JOHN DOE 1)	
d/b/a SCAMMER.INFO; RYKER)	
GILLESPIE, a resident of Arizona;)	
DONALD MARCHAN, a resident of)	
South Carolina; JOHN DOE 2 d/b/a)	
and/or operating BOBRTC.TEL;)	
JOHN DOES 3-50; and TUCOWS, a)	
Canadian company, as a nominal)	
defendant)	
)	
)	
Defendants.)	

For his Response to a Civil Action, Defendant, Ryker Gillespie ("Gillespie") hereby admits, alleges and denies as follows. Gillespie denies all allegations unless expressly admitted herein:

1. The allegations contained in paragraph 1 cannot be admitted nor denied as Gillespie has no knowledge of Fenix Protect to provide a response.

1 **2.** The allegations contained in paragraph 2 cannot be admitted nor denied
2 as Gillespie has no knowledge of this activity to provide a response.

3 **3.** The allegations contained in paragraph 3 cannot be admitted nor denied
4 as Gillespie has no knowledge of Fenix Protect or theses allegations to provide a
5 response.

6 **4.** The allegations contained in paragraph 4 cannot be admitted nor denied
7 as Gillespie has no knowledge of these websites to provide a response.

8 **5.** The allegations contained in paragraph 5 cannot be admitted nor denied
9 as Gillespie has no knowledge of Fenix Protect to provide a response.

10 **6.** The allegations contained in paragraph 6 cannot be admitted nor denied
11 as Gillespie has no knowledge of Agruss Law Firm to provide a response.

12 **7.** The allegations contained in paragraph 7 cannot be admitted nor denied
13 as Gillespie has no knowledge of BobRTC.tel to provide a response.

14 **8.** The allegations contained in paragraph 8 cannot be admitted nor denied
15 as Gillespie has no knowledge of Discord to provide a response.

16 **9.** The allegations contained in paragraph 9 cannot be admitted nor denied
17 as Gillespie has no knowledge of Scammer.info to provide a response.

18 **10.** The allegations contained in paragraph 10 are denied as Gillespie has no
19 equipment nor knowledge on how to perpetrate mass dial on Fenix. Defendant Gillespie
20 is a law-abiding citizen, who has a full time job, a band and other family interests that
21 would not afford him the time or energy to conduct a mass dial effort.

22 **11.** The allegations contained in paragraph 11 cannot be admitted nor denied
23 as Gillespie has no knowledge of Fenix Protect or their business operations to provide
24 a response.

25 **12.** The allegations contained in paragraph 12 cannot be admitted nor denied
26 as Gillespie has no knowledge of Fenix Protect to provide a response. Gillespie has no
27 intention nor interest in calling Fenix Protect.
28

1 **13.** The allegations contained in paragraph 13 cannot be admitted nor denied
2 as Gillespie has no knowledge of any of these actions to provide a response.

3 **14.** The allegations contained in paragraph 14 cannot be admitted nor denied
4 as Gillespie has no knowledge of Fenix Protect to provide a response.

5 **15.** The allegations contained in paragraph 15 cannot be admitted nor denied
6 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

7 **16.** The allegations contained in paragraph 16 cannot be admitted nor denied
8 as Gillespie has no knowledge of Icehook Systems, Inc. to provide a response.

9 **17.** The allegations contained in paragraph 17 cannot be admitted nor denied
10 as Gillespie has no knowledge of BobTRC.tel to provide a response.

11 **18.** The allegations contained in paragraph 18 cannot be admitted nor denied
12 as Gillespie has no knowledge of Discord, Inc. to provide a response.

13 **19.** The allegations contained in paragraph 19 cannot be admitted nor denied
14 as Gillespie has no knowledge of Cameron Lobban to provide a response.

15 **20.** The allegations contained in paragraph 20 cannot be admitted nor denied
16 as Gillespie has no knowledge of Donald Merchant to provide a response.

17 **21.** The allegations contained in paragraph 21 are admitted in part and denied
18 in part. Gillespie is a resident of Arizona. Gillespie has no knowledge of the website
19 BobRTC.tel.
20

21 **22.** The allegations contained in paragraph 22 cannot be admitted nor denied
22 as Gillespie has no knowledge of any other Defendants to provide a response.

23 **23.** The allegations contained in paragraph 23 cannot be admitted nor denied
24 as Gillespie has no knowledge of Tucows, Inc. to provide a response.

25 **24.** The allegations contained in paragraph 24 are admitted.

26 **25.** The allegations contained in paragraph 25 cannot be admitted nor denied
27 as Gillespie has no knowledge to provide a response.
28

1 **26.** The allegations contained in paragraph 26 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **27.** The allegations contained in paragraph 27 is denied as Gillespie has no
4 knowledge of any of these actions.

5 **28.** The allegations contained in paragraph 28 cannot be admitted nor denied
6 as Gillespie has no knowledge to provide a response.

7 **29.** The allegations contained in paragraph 29 cannot be admitted nor denied
8 as Gillespie has no knowledge of Fenix Protect to provide a response.

9 **30.** The allegations contained in paragraph 30 cannot be admitted nor denied
10 as Gillespie has no knowledge of Fenix Protect to provide a response.

11 **31.** The allegations contained in paragraph 31 cannot be admitted nor denied
12 as Gillespie has no knowledge of Fenix Protect to provide a response.

13 **32.** The allegations contained in paragraph 32 cannot be admitted nor denied
14 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

15 **33.** The allegations contained in paragraph 33 cannot be admitted nor denied
16 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

17 **34.** The allegations contained in paragraph 34 cannot be admitted nor denied
18 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

19 **35.** The allegations contained in paragraph 35 cannot be admitted nor denied
20 as Gillespie has no knowledge to provide a response.

21 **36.** The allegations contained in paragraph 36 cannot be admitted nor denied
22 as Gillespie has no knowledge to provide a response.

23 **37.** The allegations contained in paragraph 37 cannot be admitted nor denied
24 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

25 **38.** The allegations contained in paragraph 38 cannot be admitted nor denied
26 as Gillespie has no knowledge to provide a response.
27
28

1 **39.** The allegations contained in paragraph 39 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **40.** The allegations contained in paragraph 40 cannot be admitted nor denied
4 as Gillespie has no knowledge to provide a response.

5 **41.** The allegations contained in paragraph 41 cannot be admitted nor denied
6 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

7 **42.** The allegations contained in paragraph 42 cannot be admitted nor denied
8 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

9 **43.** The allegations contained in paragraph 43 cannot be admitted nor denied
10 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

11 **44.** The allegations contained in paragraph 44 cannot be admitted nor denied
12 as Gillespie has no knowledge to provide a response.

13 **45.** The allegations contained in paragraph 45 cannot be admitted nor denied
14 as Gillespie has no knowledge of Scammer.info and Discord to provide a response.

15 **46.** The allegations contained in paragraph 46 cannot be admitted nor denied
16 as Gillespie has no knowledge of John Does 3-50 to provide a response.

17 **47.** The allegations contained in paragraph 47 cannot be admitted nor denied
18 as Gillespie has no knowledge of BobRTC.tel to provide a response.

19 **48.** The allegations contained in paragraph 48 cannot be admitted nor denied
20 as Gillespie has no knowledge of BobRTC.tel to provide a response.

21 **49.** The allegations contained in paragraph 49 cannot be admitted nor denied
22 as Gillespie has no knowledge of BobRTC.tel to provide a response.

23 **50.** The allegations contained in paragraph 50 cannot be admitted nor denied
24 as Gillespie has no knowledge to provide a response.

25 **51.** The allegations contained in paragraph 51 cannot be admitted nor denied
26 as Gillespie has no knowledge to provide a response.
27
28

1 **52.** The allegations contained in paragraph 52 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **53.** The allegations contained in paragraph 53 cannot be admitted nor denied
4 as Gillespie has no knowledge to provide a response.

5 **54.** The allegations contained in paragraph 54 cannot be admitted nor denied
6 as Gillespie has no knowledge to provide a response.

7 **55.** The allegations contained in paragraph 55 cannot be admitted nor denied
8 as Gillespie has no knowledge to provide a response.

9 **56.** The allegations contained in paragraph 56 cannot be admitted nor denied
10 as Gillespie has no knowledge to provide a response.

11 **57.** The allegations contained in paragraph 57 cannot be admitted nor denied
12 as Gillespie has no knowledge to provide a response.

13 **58.** The allegations contained in paragraph 58 cannot be admitted nor denied
14 as Gillespie has no knowledge to provide a response.

15 **59.** The allegations contained in paragraph 59 cannot be admitted nor denied
16 as Gillespie has no knowledge to provide a response.

17 **60.** The allegations contained in paragraph 60 cannot be admitted nor denied
18 as Gillespie has no knowledge to provide a response.

19 **61.** The allegations contained in paragraph 61 cannot be admitted nor denied
20 as Gillespie has no knowledge to provide a response.

21 **62.** The allegations contained in paragraph 62 cannot be admitted nor denied
22 as Gillespie has no knowledge to provide a response.

23 **63.** The allegations contained in paragraph 63 cannot be admitted nor denied
24 as Gillespie has no knowledge to provide a response.

25 **64.** The allegations contained in paragraph 64 cannot be admitted nor denied
26 as Gillespie has no knowledge to provide a response.
27
28

1 **65.** The allegations contained in paragraph 65 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **66.** The allegations contained in paragraph 66 cannot be admitted nor denied
4 as Gillespie has no knowledge to provide a response.

5 **67.** The allegations contained in paragraph 67 cannot be admitted nor denied
6 as Gillespie has no knowledge of Tuscow to provide a response.

7 **68.** The allegations contained in paragraph 68 cannot be admitted nor denied
8 as Gillespie has no knowledge of Tuscow to provide a response.

9 **69.** The allegations contained in paragraph 69 cannot be admitted nor denied
10 as Gillespie has no knowledge of Tucows to provide a response.

11 **70.** The allegations contained in paragraph 70 cannot be admitted nor denied
12 as Gillespie has no knowledge to provide a response.

13 **71.** The allegations contained in paragraph 71 cannot be admitted nor denied
14 as Gillespie has no knowledge to provide a response.

15 **72.** The allegations contained in paragraph 72 cannot be admitted nor denied
16 as Gillespie has no knowledge to provide a response.

17 **73.** The allegations contained in paragraph 73 cannot be admitted nor denied
18 as Gillespie has no knowledge to provide a response.

19 **74.** The allegations contained in paragraph 74 cannot be admitted nor denied
20 as Gillespie has no knowledge to provide a response.

21 **75.** The allegations contained in paragraph 75 cannot be admitted nor denied
22 as Gillespie has no knowledge of Fenix Protect to provide a response.

23 **76.** The allegations contained in paragraph 76 cannot be admitted nor denied
24 as Gillespie has no knowledge of Agruss Law Firm, LLC to provide a response.

25 **77.** The allegations contained in paragraph 77 cannot be admitted nor denied
26 as Gillespie has no knowledge to provide a response.
27
28

1 **78.** The allegations contained in paragraph 78 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **79.** The allegations contained in paragraph 79 cannot be admitted nor denied
4 as Gillespie has no knowledge to provide a response.

5 **80.** The allegations contained in paragraph 80 are denied. Gillespie did not
6 participate in any type of coordinated calling. Gillespie has no knowledge of any of the
7 businesses or attacks Plaintiff accuses Gillespie of.

8 **81.** The allegations contained in paragraph 81 cannot be admitted nor denied
9 as Gillespie has no knowledge to provide a response.

10 **82.** The allegations contained in paragraph 82 cannot be admitted nor denied
11 as Gillespie has no knowledge to provide a response.

12 **83.** The allegations contained in paragraph 83 cannot be admitted nor denied
13 as Gillespie has no knowledge to provide a response.

14 **84.** The allegations contained in paragraph 84 cannot be admitted nor denied
15 as Gillespie has no knowledge to provide a response.

16 **85.** The allegations contained in paragraph 85 cannot be admitted nor denied
17 as Gillespie has no knowledge to provide a response.

18 **86.** The allegations contained in paragraph 86 cannot be admitted nor denied
19 as Gillespie has no knowledge to provide a response.

20 **87.** The allegations contained in paragraph 87 cannot be admitted nor denied
21 as Gillespie has no knowledge to provide a response.

22 **88.** The allegations contained in paragraph 88 cannot be admitted nor denied
23 as Gillespie has no knowledge to provide a response.

24 **89.** The allegations contained in paragraph 89 cannot be admitted nor denied
25 as Gillespie has no knowledge to provide a response.

26 **90.** The allegations contained in paragraph 90 cannot be admitted nor denied
27 as Gillespie has no knowledge to provide a response.
28

1 **91.** The allegations contained in paragraph 91 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **92.** The allegations contained in paragraph 92 are denied. Gillespie has never
4 accessed the Fenix Computer System. Gillespie had no knowledge of Fenix until
5 Gillespie was served with the Demand for Jury Trial. Gillespie did not participate in
6 any type of coordinated attack upon Fenix

7 **93.** The allegations contained in paragraph 93 cannot be admitted nor denied
8 as Gillespie has no knowledge of Icehook or BobRTC.tel to provide a response.

9 **94.** The allegations contained in paragraph 94 cannot be admitted nor denied
10 as Gillespie has no knowledge of Discord or Scammer to provide a response.

11 **95.** The allegations contained in paragraph 95 cannot be admitted nor denied
12 as Gillespie has no knowledge to provide a response.

13 **96.** The allegations contained in paragraph 96 cannot be admitted nor denied
14 as Gillespie has no knowledge to provide a response.

15 **97.** The allegations contained in paragraph 97 cannot be admitted nor denied
16 as Gillespie has no knowledge to provide a response.

17 **98.** The allegations contained in paragraph 98 cannot be admitted nor denied
18 as Gillespie has no knowledge to provide a response.

19 **99.** The allegations contained in paragraph 99 cannot be admitted nor denied
20 as Gillespie has no knowledge to provide a response.

21 **100.** The allegations contained in paragraph 100 cannot be admitted nor denied
22 as Gillespie has no knowledge to provide a response.

23 **101.** The allegations contained in paragraph 101 cannot be admitted nor denied
24 as Gillespie has no knowledge to provide a response.

25 **102.** The allegations contained in paragraph 102 are denied. Gillespie did not
26 participate in any type of coordinated attack and has no knowledge of any posts or sites
27 for Scammer.info and Discord.
28

1 **103.** The allegations contained in paragraph 103 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **104.** The allegations contained in paragraph 104 cannot be admitted nor denied
4 as Gillespie has no knowledge to provide a response.

5 **105.** The allegations contained in paragraph 105 are denied. Gillespie did not
6 trespass against Fenix Computer System or participate in any type of attack against
7 Fenix.

8 **106.** The allegations contained in paragraph 106 cannot be admitted nor denied
9 as Gillespie has no knowledge to provide a response.

10 **107.** The allegations contained in paragraph 107 cannot be admitted nor denied
11 as Gillespie has no knowledge of Fenix Protect to provide a response.

12 **108.** The allegations contained in paragraph 108 cannot be admitted nor denied
13 as Gillespie has no knowledge of Fenix Protect to provide a response.

14 **109.** The allegations contained in paragraph 109 cannot be admitted nor denied
15 as Gillespie has no knowledge to provide a response.

16 **110.** The allegations contained in paragraph 110 cannot be admitted nor denied
17 as Gillespie has no knowledge to provide a response.

18 **111.** The allegations contained in paragraph 111 cannot be admitted nor denied
19 as Gillespie has no knowledge to provide a response.

20 **112.** The allegations contained in paragraph 112 cannot be admitted nor denied
21 as Gillespie has no knowledge of Fenix Protect to provide a response.

22 **113.** The allegations contained in paragraph 113 cannot be admitted nor denied
23 as Gillespie has no knowledge of Fenix Protect to provide a response.

24 **114.** The allegations contained in paragraph 114 cannot be admitted nor denied
25 as Gillespie has no knowledge of Fenix Protect to provide a response.

26 **115.** The allegations contained in paragraph 115 cannot be admitted nor denied
27 as Gillespie has no knowledge of Fenix Protect to provide a response.
28

1 **116.** The allegations contained in paragraph 116 cannot be admitted nor denied
2 as Gillespie has no knowledge to provide a response.

3 **117.** The allegations contained in paragraph 117 cannot be admitted nor denied
4 as Gillespie has no knowledge to provide a response.

5 **118.** The allegations contained in paragraph 118 cannot be admitted nor denied
6 as Gillespie has no knowledge to provide a response.

7 **119.** The allegations contained in paragraph 119 cannot be admitted nor denied
8 as Gillespie has no knowledge to provide a response.

9 **120.** The allegations contained in paragraph 120 cannot be admitted nor denied
10 as Gillespie has no knowledge to provide a response.

11 **121.** The allegations contained in paragraph 121 are denied. Gillespie has
12 never attempted to harm Fenix in any way. Gillespie had no knowledge Fenix existed
13 as a business nor attempted to harm Fenix.

14 **122.** The allegations contained in paragraph 122 cannot be admitted nor denied
15 as Gillespie has no knowledge to provide a response.

16 **123.** The allegations contained in paragraph 123 cannot be admitted nor denied
17 as Gillespie has no knowledge to provide a response.

18 **124.** The allegations contained in paragraph 124 cannot be admitted nor denied
19 as Gillespie has no knowledge to provide a response.

20 **125.** The allegations contained in paragraph 125 cannot be admitted nor denied
21 as Gillespie has no knowledge to provide a response.

22 **126.** The allegations contained in paragraph 126 cannot be admitted nor denied
23 as Gillespie has no knowledge to provide a response.

24 **127.** The allegations contained in paragraph 127 cannot be admitted nor denied
25 as Gillespie has no knowledge to provide a response.

26 **128.** The allegations contained in paragraph 128 cannot be admitted nor denied
27 as Gillespie has no knowledge to provide a response.
28

1 WHEREFORE, Defendant Gillespie prays for the following relief:

2 A. Defendant Gillespie be released from inclusion with this case;

3 B. Any and all court fees Defendant Gillespie has been forced to pay be
4 reimbursed to him as he should not be a party to this case;


5 C. Any other relief this Court deems just and proper.
6

7 **RESPECTFULLY SUBMITTED** this ____ day of September, 2020.
8

9
10 By: 
11 Ryker Gillespie
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STATE OF ARIZONA)
County of Pinal) ss.

I, Ryker Gillespie, being duly sworn and under oath, state that I have read this Answer to a Civil Action, and all the statements are accurate and complete to the best of my knowledge and belief.


Ryker Gillespie

Subscribed and sworn to before me, a duly authorized Notary Public, this _____ day of September, 2020, by Ryker Gillespie

Notary Public

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